



Carroll D. Bessing
Secretary

State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
PO Box 18448, 1126 N Military Ave
Green Bay, Wisconsin 54807-0448
Main Number: 414/482-8888
Fax Number: 414/482-8819

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 3, 1992

In reply refer to: 4190

Dale Hanke, VP Operations
Red Arrow Products
1226 South Water Street
Manitowoc, WI 54221-1537

Re: Notice of Violation
Chapter 144, Wisconsin Statutes

Dear Mr. Hanke:

This letter formally notifies the company pursuant to section 144.423, Wis. Stats., that the Department has reason to believe that Red Arrow Products, Inc., is in violation of Wisconsin's air management laws. Specifically, the department has reason to believe that the following provisions of the Wisconsin Administrative Code have been violated at your 1226 South Water Street facility:

- 1) Section NR 408.04, Wis. Adm. Code - Violations. Any owner or operator who fails to construct and operate a stationary source in accordance with conditions imposed under s. 144.394 Stats., shall be considered in violation of s. 144.391, Stats.

The sawdust dryer (source P01, stack S01) was operated between April 1991 to May 1992 with a stack height of approximately 39 feet. This is less than the 50 foot stack height required by permit 85-IRS-046.

- 2) Section NR 408.04, Wis. Adm. Code - Violations. Any owner or operator who fails to construct and operate a stationary source in accordance with conditions imposed under s. 144.394 Stats., shall be considered in violation of s. 144.391, Stats.

Two violations of permit limits in permit #85-IRS-046 for the sawdust dryer are noted. A stack test on the sawdust dryer (source P01, stack S01) on June 11, 1992 showed an average particulate emission rate of 0.261 lb per 1000 lb gas; this is greater than the allowed 0.2 lb per 1000 lb gas. The

same stack test also showed carbon monoxide emissions of 3.52 lb/hr; this is greater than the allowed 0.3 lb/hr.

- 3). Section NR 406.03, Wis. Adm. Code - Permit requirements and exemptions for construction or modification and new operation permits. No person may commence construction, reconstruction, replacement, relocation or modification of a stationary source or operate the constructed, reconstructed, replaced, relocated or modified stationary source unless the person has a construction or modification and new operation permit for the source or unless the source is exempt from the requirement to obtain a permit under s. 144.391(4) or (5), Stats., or under this chapter.

The following table lists each source installed without a permit in violation of this section, and the date the violation occurred.

Source Description	Source I.D. #	Date Installed	Uncontrolled Emission lb/hr			Date of Violation
			VOC	CO	NOx	
Dry Products	P03	5/81	2.10	.011	.05	8/28/88
Grillin	P05	5/87	0.10	.004	.02	8/28/88
Reactor #1	P02	8/28/88	15.02	40.55	.81	8/28/88
LFB	P04	5/89	.8	.00	.00	10/21/89
Reactor #2	P02	10/21/89	15.02	40.55	.81	10/21/89
Reactor #3	P02	3/19/90	15.02	40.55	.75	3/19/90
Reactor #4	P02	3/19/90	15.02	40.55	.75	3/19/90
RTP2	P02	late 1990	.008	.01	.06	9/02/91
Reactor #5	P02	9/02/91	15.02	40.55	.75	9/02/91
RTP1	P02	2/92	20.03	54.08	1.08	2/92
Boiler	B03	2/92	.10	.59	2.35	2/92

Dates of violation shown are based on incremental growth since issuance of the last new source permit, dated 5/11/87; or exceedance of potential emission rates for VOC, CO or NOx of 5.7, 9.0 or 9.0 pounds per hour, respectively.

- 4) Section NR 101.22, Wis. Adm. Code - Content of air emission reports. Air emission reports required by s. NR 101.21 shall be on forms supplied by the department and shall contain the information specified in this section.

Dale Hanke, Red Arrow Products
November 3, 1992

Annual air emissions from the liquid smoke reactors (source P02), LFB process (source P04) and Grillin process (source P05) were not reported on the air emission inventory from the date these processes commenced operation, until 1992.

- 5) Section NR 415.03, Wis. Adm. Code - General limitations. No person may cause, allow, or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard, or creates air pollution.

As a result of a complaint received March 3, 1992, and observation by Jim Crawford on March 12, 1992 of the plume from the sawdust dryer dispersing over the U.S. Post Office (located across the street at 1226 S. Water Street), it is believed that particulate emissions from the exhaust of the sawdust dryer (source P01, S01) create air pollution and impact the immediate area in violation of Section NR 415.03, Wis. Adm. Code.

Please be advised that the Department is authorized to seek injunctive or other appropriate relief for violations of air pollution laws, including forfeitures of no more than \$ 25,000 per violation, pursuant to s. 144.426(1), Stats. Any person who intentionally commits an act that violates or fails to perform an act required by laws relating to air pollution may be fined not more than \$25,000 per day of violation or imprisoned for not more than 6 months or both, pursuant to s. 144.426(2), Stats. Each day of violation is considered a separate offense.

We are extending the opportunity for you to respond to this Notice with an explanation of any extenuating circumstances surrounding this situation and an update on the progress you have made to return this facility to compliance. Please respond in writing within 10 days of the date of receipt of this letter.

Include in this response what actions you have taken or will take to achieve compliance with the violations noted herein, and the timeframes involved. By this date, also submit an application to modify permit #85-IRS-046 with respect to CO and particulate emissions from your sawdust dryer. A set of application forms is enclosed. Please direct your response and questions to Jim Crawford at 414-492-5794.

Sincerely,



David E. Pflug
Environmental Enforcement Coordinator

cc: Brenda Hagman - AM/7
Tom Steidl - LC/5
Mike DeBrock/Jim Crawford - LMD